



CITY of WESTMINSTER

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November 16, 1990

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Office of the Mayor

4800 West 92nd Avenue
Westminster, Colorado
80030

303.430.2400
FAX 303.426.5857

George Hovorka
Mayor

Fred Allen
Mayor Pro Tem

Sam Dixon
Councilwoman

Kenneth E. Harris
Councilman

Robert Hartwig
Councilman

Nancy M. Heil
Councilwoman

Carl W. Walzak
Councilman

Beth Brainard, Public Affairs Officer
U.S. Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, Colorado 80402-0928

Dear Ms. Brainard:

I am writing on behalf of the City of Westminster to provide comments on the Proposed Surface Water Interim Measures/Interim Remedial Action Plan and Decision Document for the 903 Pad, Mound and East Trenches Area. The City of Westminster is very interested in the proposed plan because of the potential impact to the City's water supply, Standley Lake.

Standley Lake is located east of the Rocky Flats Plant and currently receives water from Woman Creek, which flows through the Rocky Flats Plant site. Standley Lake also provides drinking water for the Cities of Thornton, Northglenn, and Federal Heights, as well as irrigation water for the Farmers Reservoir and Irrigation Company. The value of Standley Lake and the associated water rights as a source have a value in excess of \$300 million and is essentially irreplaceable.

Westminster officials have reviewed the proposed plan and is pleased that this operable unit has been given a high priority because of the highly contaminated nature of this unit. However, because it is so contaminated, the cleanup of the site introduces new opportunities for the contamination to impact Standley Lake. For example, collecting the water in the sumps allows for the opportunity of a large amount of water to be released to the surface waters at one time during a storm event. Installation of the sumps and other features of the plan will result in exposure of contaminated soil, which can be transported by high winds or a large storm event. Therefore, while we believe this cleanup should proceed, it must go forward with the proper precautions in place.

Westminster believes the most effective means of protecting Standley Lake is the interceptor canal system which has been developed through Congressman Skaggs' Option Review Group and has come to be known as Option B. The United States Department of Energy (DOE) has committed to funding a portion of that project during Fiscal Year 1991; however means of reimbursing the Cities for the project have not yet been worked out. In addition, the project is threatened with delay by DOE's apparent stance that a NEPA review of the project must take place. Westminster does not believe that NEPA applies to the

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initial stages of this project, because it is a City project which will go forward regardless of federal funding. If construction of the interceptor canal is delayed by an unnecessary NEPA review, it would not be in place by the time construction of the interim measure began. This scenario is not acceptable to Westminster. The interceptor canal must be in place prior to the initiation of construction of the interim measures because of the potential for contamination of the water supply.

The document fails to fully consider the potential impacts to water quality from the proposed plan. Impacts could occur from storm events transporting soil or contaminated water downstream, accidents involving the transport trucks, and many other incidents. The failure to fully consider these types of events and their impacts to the downstream water supply is inexcusable. When the potential impacts are considered, the only reasonable means to protect the water supply is construction of the interceptor canal prior to construction of this remedial measure.

As currently proposed, the plan calls for discharge of the effluent to Walnut Creek. Westminster would not allow discharge of the effluent to Woman Creek in the absence of the interceptor canal because there are no safeguards to insure that the effluent meets standards before it is discharged to the surface water stream. It is highly likely that water which still contains elevated levels of contaminants will be leaving the treatment system at times, and Westminster will not accept discharge of such water into Woman Creek unless the interceptor canal is in place.

The plan currently calls for transporting the water collected in the Woman Creek basin to the treatment facility by truck. This also presents a hazard to the water supply. In the event of an accident, the large amount of liquid being transported could spill at one time, increasing the likelihood that this water would reach and impact Standley Lake. This is further justification for having the interceptor canal in place prior to initiating this project. The plan also states that it may be difficult to access the collection sites during the Winter, but that this should not be a problem because flows from the seeps are usually low in the Winter. It would probably be difficult to access the site during the wet, Spring season also, unless the roads are improved. The Spring season is also a time of high flow, therefore, it is important to be able to access the sites at all times.

What preliminary testing has been done regarding the proposed treatment processes on the actual contaminated water? The Rocky Flats Plant has had problems in the past treating water from the ponds using "proven" technology which had worked in bench scale testing, but was ineffective in the field. The effectiveness of the proposed treatment methods should be confirmed prior to initiating construction.

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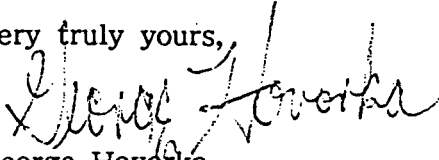
The proposed treatment capacity of 50 gpm is not sufficient. Even the limited flow data which is available has shown flows greater than twice that flow from only one source. An upstream holding tank to handle the higher flows should be included in the plan or the capacity of the entire treatment system should be increased.

The water quality data presented in the report indicates extraordinarily high beta levels, with a maximum of 340 pCi/l, and other values over 60 pCi/l. What is the source of the beta radiation? Westminster has been told numerous times that the Rocky Flats Plant does not handle any beta emitting radionuclides, yet the testing results indicate very high levels of beta.

A holding tank to store the effluent from the system should be included, which would enable testing of the effluent prior to discharge.

Thank you for the opportunity to comment on this important plan. Westminster looks forward to the United States Department of Energy implementing measures to address the concerns of the City which have been outlined.

Very truly yours,


George Hovorka
Mayor

cc: Members of City Council
Margaret Carpenter, City of Thornton
Bob Schulze, City of Broomfield
Don Parsons, City of Northglenn
Robert Nelson, Department of Energy
Bill Christopher, City Manager